

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:22-cv-00422-JRG-RSP

JURY DEMANDED

**DECLARATION OF KRISTOPHER R. DAVIS IN SUPPORT OF PLAINTIFF
HEADWATER RESEARCH LLC'S OPPOSITION TO SAMSUNG DEFENDANTS'
MOTION TO STRIKE CERTAIN OPINIONS OFFERED BY DR. RICHARD D. WESEL**

I, Kristopher R. Davis, declare and state as follows:

1. I am a member of the State Bar of California and a partner at the firm of Russ August & Kabat, counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Reply in Support of Its Motion to Amend Infringement Contentions. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Exhibits A-P were submitted with Samsung's Opening Brief (Dkt. 165).

3. Attached as Exhibit 1 is a true and correct copy of excerpts from Headwater's Seventh Supplemental Objections and Responses to Samsung's First Set of Interrogatories (Nos. 1-12), dated March 15, 2024.

4. Attached as Exhibit 2 is a true and correct copy of excerpts from Samsung's Amended Non-Infringement Contentions, dated March 15, 2024.

5. Attached as Exhibit 3 is a true and correct copy of the Android developer webpage titled "Power management," available at <https://developer.android.com/about/versions/pie/power#battery-saver>, printed on April 16, 2024.

6. Attached as Exhibit 4 is a true and correct copy of the Android developer webpage titled "Power management restrictions," available at <https://developer.android.com/topic/performance/power/power-details>, printed on April 16, 2024.

7. Attached as Exhibit 5 is a true and correct copy of the Android developer webpage titled "Optimize network data usage," available at <https://developer.android.com/develop/connectivity/network-ops/data-saver>, printed on April 16, 2024.

8. Attached as Exhibit 6 is a true and correct copy of SAM-HW00155680, dated

March 28, 2017.

Executed on April 17, 2024 in Los Angeles, California.

/s/ Kristopher R. Davis

Kristopher R. Davis

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3) on April 17, 2024.

/s/ Kristopher R. Davis

Kristopher R. Davis